

June 6, 2025

## VIA ECF

Dana Green Vice President & Assistant General Counsel

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620 8th Avenue New York, NY 10018 nytimes.com The Honorable Analisa Torres United States District Judge Daniel Patrick Moynihan United States Courthouse 500 Pearl St. New York, NY 10007-1312

Re: <u>The New York Times Company, et al. v. United States Department of Justice, 23-cv-4402-AT</u>

Dear Judge Torres:

I am counsel for Plaintiffs The New York Times Company and Mara Hvistendahl (together, "The Times") in the above-referenced Freedom of Information Act ("FOIA") action, in which The Times sought the release of a report prepared by the Office of the Inspector General regarding misconduct by certain officials at the Federal Bureau of Investigations.

I write pursuant to Rule I.C of your Honor's Individual Practices to a 30-day extension of time for The Times to file a motion for attorneys' fees pursuant to 5 U.S.C. 552(a)(4)(E). This is The Times's third request for such an extension of time and Defendant consents to it.

The Times's motion for fees initially was due on April 10, 2025. Your Honor has twice granted a 30-day extension of the deadline; The Times's motion currently is due June 9, 2025. The parties have been in communication in an effort to resolve this matter without the need for motion practice. The Times's requests this further extension so that the parties may continue those discussions.

Respectfully submitted,

Dana Green

Vice President and Assistant General Counsel

cc: All counsel of record (via ECF)